



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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ATLANTA, GEORGIA 30303-8960

November 6, 2014

Ms. Alfredo Acoff  
Alabama Department of Transportation  
1409 Coliseum Boulevard Centers  
Montgomery, Alabama 36110

**Subject: EPA Comments on the Draft Environmental Impact Statement for  
I-10 Mobile River Bridge and Bayway Widening  
Mobile and Baldwin Counties, Alabama.  
Project No. DPI-0030(005); CEQ #: 20140213; ERP#: FHW-E40849-AL.**

Dear Ms. Acoff:

Pursuant to Section 309 of the Clean Air Act,) and Section 102(2)(c) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) reviewed the subject document. EPA participated in site visits and meetings associated with the proposed project including a public meeting on September 23, 2014, in Mobile, Alabama. The purpose of this letter is to provide you with EPA's comments and recommendations on the draft environmental impacts statement (DEIS) that should be considered in the development of the final environmental impact statement.

According to the DEIS, the Federal Highway Administration (FHWA) and the Alabama Department of Transportation (ALDOT) propose to construct a new six-lane, 215-foot bridge across Mobile River and widen the existing I-10 bridges from four to eight lanes. The purpose of the project is to construct a structure that can accommodate current and future traffic demands as well as provide a direct route for vehicles transporting prohibited hazardous materials across the Mobile River, while minimizing impacts to Mobile Harbor. The existing traffic volumes on I-10 crossing the Mobile River currently operate at a level of Service of F with delays during peak hours (DEIS, 2014).

The DEIS evaluates several alternatives including a no-action alternative and four build alternates (A, B, B', and C). It also identifies a preferred alternative (B'). The preferred 10-mile alignment begins at Virginia Street, crosses the Mobile River just south of the Mobile Cruise Terminal, continues across Pinto Island and joins the center of the Bayway, which will be widened by two-lanes in each direction from the bridge meeting point to Daphne. It is EPA's understanding that additional right-of-way will be required for the proposed Mobile River bridge, but that the proposed widening should occur within the existing footprint of the Bayway.

Based on a review of the project impacts, EPA provided detailed comments regarding air quality, cultural resource, water resources, noise and community impacts. The selection of B' relative to the other proposed build alternatives assessed in the DEIS minimizes impacts to communities, cultural resources and the environment. Nevertheless, we recommend that the FEIS describe efforts to further avoid, minimize, mitigate and/or clarify noise, water resource, and cultural resources impacts described in the detailed comments. EPA rates this DEIS as EC-2 i.e., EPA has "Environmental Concerns" and "Additional Information" is requested. EPA's rating system can be found online at: <http://www.epa.gov/oecaerth/nepa/comments/ratings.html>. Appropriate best management practices should be implemented and described in the FEIS to ensure that impacts to sensitive aquatic resources or species are minimized and/or appropriately mitigated. EPA should be consulted, when appropriate.

EPA appreciates the opportunity to review the proposed DEIS. If you have any questions regarding our comments, please contact Ntale Kajumba (404/562-9620) of my staff.

Sincerely,



Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Environmental Accountability

Attachment:  
EPA Detailed Comments



## **EPA Detailed Comments on the DEIS for I- 10 Mobile Bridge and Bayway**

### ***Air Quality***

The DEIS provides a description of the air impacts that will result from both the construction and the use of the bridges proposed in the project. Mobile and Baldwin are currently in attainment for all National Ambient Air Quality Standards (NAAQS). The DEIS also includes a Carbon Monoxide hotspot analysis despite the areas attainment status. For section 4.17.3, Air Quality Impacts, during Construction, EPA recommends that the project implement overall diesel emission reduction activities through various measures such as: switching to cleaner fuels, retrofitting current equipment with emission reduction technologies, repowering older engines with newer cleaner engines, replacing older vehicles, and reducing idling through operator training and/or contracting policies. EPA can assist in the future development or implementation of these options.

### ***Historic Resources***

Based on the DEIS, concerns remain regarding impacts to cultural resources in Mobile. Cultural resource surveys were conducted and an initial determination of no adverse indirect effects on cultural resources has been made. The preferred alternative is the alternative that is furthest away from historic resources in downtown Mobile and avoids direct impacts to Old Union Hall, which is eligible for the National Register of Historic Places and avoids the use of a Section 4(f) resource. However, EPA notes that FHWA and ALDOT continues to consult with the State Historic Preservation Officer (SHPO) and Section 106 Consulting Parties regarding their persistent concerns and ALDOT will need to conduct additional archeological surveys on some of the alternatives. EPA recommends that the FEIS should document the results of the consultation process and any remaining survey results.

### ***Water Resources and Water Quality***

In section 4.12, Water Quality and Biological Resources, the DEIS indicates that lower congestion rates and reduced low-speed and idled traffic are likely to result in decreased leaks of oil and combustion-related pollutants because inefficient combustion at low speeds would be reduced. However, the DEIS should also consider that a widened Bayway is also likely to result in an increased volume of traffic, increasing the number of emission sources contributing to emission-related products in runoff to Mobile Bay and River.

Section 4.12.4 states, "Calculations of wetland impacts have been derived based on the structural dimensions and projected as ground impacts," and refers to Figures 8a and 8b. EPA recommends that the text provide quantified impacts. In addition, the rationale for the "wetlands avoided" area marked on Figure 8a and 8b is unclear. The DEIS should indicate why the wetland avoided areas are much wider than the proposed expanded Bayway.

Section 4.12.4.6 indicates that "Further discussion of mitigation alternatives will be conducted with ADEM, USACE, USFWS, and NMFS during development of the mitigation plan." "The draft and final mitigation plans will be developed in consultation with the USACE, USFWS, NMFS, ADEM, and local agencies, as appropriate." EPA has a critical role in reviewing compensatory mitigation proposals. ALDOT should also consult with EPA.

The DEIS indicates that construction would occur across impaired waterbodies, the Mobile River, Mobile to Spanish River, Joes's Branch from its source to D' Olive Creek, and D'Olive Creek from its source to D'Olive Bay. Joe's Branch and D'Olive Creek are both listed for siltation. Section 4.17, Construction Impacts, states that, "Best Management Practices will be utilized to control sedimentation and stormwater runoff during construction." EPA requests that additional information be provided for review in the Final EIS.

Section 4.23 Environmental Commitments states re: Wetland and SAV Surveys: "Appropriate mitigation measures will be developed in consultation with resource agencies including US Corps of Engineer (USCOE), USFWS, NMFS, and ADEM." EPA has a critical role in reviewing compensatory mitigation proposals. Therefore, we recommend that ALDOT should consult with EPA, as well.

Section 6.0 makes no mention of EPA as an agency that should be or has been coordinated with.

### ***Lighting***

Section 4.15, Lighting, describes directing lighting such that it does not fall outside of the right of ways. EPA recommends also considering how to limit light pollution that may affect wildlife, such as shielding light that would be directed upward, disrupting owls and other birds active at dusk and night. Also, lighting that would shine over water such that it could disrupt aquatic species activities should be minimized. All of the above should be addressed for construction and permanent lighting.

### ***Noise***

Section ES-10, Traffic Noise Impacts, indicates that 1,065 noise-sensitive receptor are within the vicinity of the build alternatives. The preferred alternative may result in noise impacts to 275 receptors. These sites either approach or exceed the noise abatement criteria. Although noise barriers were evaluated as part of the EIS, no noise minimization strategies are proposed. Given the magnitude of the impacts, EPA recommends that the FEIS include viable strategies to minimize noise related impacts to local communities.

### ***Environmental Justice (EJ)***

EPA notes the inclusion of environmental justice (EJ) as part of the assessment process. The DEIS indicates that there are census blocks (11, 12 and 13.02 and 15.02) in and around the Central Texas Neighborhood with higher minority and low-income populations. In addition, there are two minority citizen organizations - the Central Texas Neighborhood Association and the Down the Bay Community Organization. The preferred alternative avoids relocating minority residents, but the closing to the Texas Street interchange will be inconvenient for residents that use this interchange, and the high noise levels currently experienced by residents in the Central Texas Neighborhood will increase slightly. The DEIS identifies an alternate interchange and provides information regarding various public engagement and outreach activities within the affected communities. EPA notes that some of those targeted outreach events occurred over ten years ago. We recommend that the EJ section of the FEIS summarize the existing noise levels in the EJ communities and summarize any concerns expressed by the community in relationship to the proposed project.



### ***Pedestrian and Bicycle Facilities***

While the need for additional vehicle capacity has been clearly demonstrated, EPA strongly encourages the implementation of a “Complete Streets” design in order to provide citizens—within the project limits—with safe and user-friendly facilities to support transit, bicycle, and pedestrian modes of transportation for accessing places along the corridor. These accommodations could also help reduce Mobile Source Air Toxics (MSATs). A recently-published study by the Transportation Research Board concluded that buffered bicycle lanes encourage cyclists to ride outside the door zone (see Recommended Bicycle Lane Widths for Various Roadway Characteristics (NCHRP Report 766) and Bicycles 2013: Planning, Design, Operations, and Infrastructure (Journal of the TRB, No. 2387)). EPA encourages the inclusion of this scientific research in developing appropriate urban roadway design. EPA notes ALDOT’s commitment to providing pedestrian access across the Mobile River. The DEIS states that this may be via the Cochran Bridge or the Bankhead Tunnel. EPA also notes that the public was also interested in having access to the proposed I-10 Mobile Bridge via bicycle. We encourage ongoing coordination with the appropriate stakeholders to ensure that an appropriate solution is reached.